

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1(b)

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Attorneys for the New Jersey Coverage Action Plaintiff-Insurers

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 21-30589 (MBK)

Hearing Date: March 30, 2022

**DECLARATION OF SHAYA ROCHESTER IN SUPPORT OF NEW
JERSEY COVERAGE ACTION PLAINTIFF-INSURERS' OMNIBUS REPLY
IN FURTHER SUPPORT OF MOTION FOR AN ORDER (I) CONFIRMING
THAT THE AUTOMATIC STAY DOES NOT APPLY TO THE NEW**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**JERSEY COVERAGE ACTION OR, IN THE ALTERNATIVE,
(II) GRANTING RELIEF FROM THE AUTOMATIC STAY TO
ALLOW THE NEW JERSEY COVERAGE ACTION TO PROCEED**

I, Shaya Rochester, declare as follows:

1. I am a partner at the firm Katten Muchin Rosenman, LLP. I submit this declaration in support of the *New Jersey Coverage Action Plaintiff-Insurers' Omnibus Reply in Further Support of Motion for an Order (I) Confirming that the Automatic Stay Does Not Apply to the New Jersey Coverage Action or, in the Alternative (II) Granting Relief from the Automatic Stay to Allow the New Jersey Coverage Action to Proceed* (the "Reply"),² filed on March 25, 2022.

2. This declaration and the statements made in the Reply are based on my personal knowledge and upon my review of the records of this and related matters.

3. Attached as Exhibit 1 is a true and correct copy of the email from Eileen McCabe to Thomas Ladd, dated September 8, 2021.

4. Attached as Exhibit 2 is a true and correct copy of the email from Thomas Ladd to Eileen McCabe, dated October 13, 2021.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 25, 2022
New York, NY

/s/ Shaya Rochester
Shaya Rochester

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the Reply.